



231 Watford Road

Planning Statement

For **Fruition Properties Limited**



September 2021

Stantec UK Limited

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For and on behalf of Stantec UK Limited

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1 Introduction

- 1.1 Stantec UK Ltd are instructed by Fruition Properties Limited ('the Applicant') to prepare a Planning Statement in support of a full planning application for residential development at 231 Watford Road, Harrow, HA1 3TU ('the Site').
- 1.2 The planning application is made for:
'Demolition of the existing building and the erection of a part three, part four and part five storey building to provide residential dwellings (Use Class C3); car and cycle parking; landscaping, amenity space and play area; and refuse storage and other associated works.'
- 1.3 The proposals follow extensive pre-application engagement with the London Borough of Brent ('LBB') planning officers throughout 2020 and 2021; presentation of the proposals at a LBB Design Review workshop in June 2021; and public consultation in June-July 2021.
- 1.4 The proposals will optimise the Site for new residential development on underutilised land within a predominately residential area, responding well to the character of the local area.
- 1.5 This Planning Statement should be read in conjunction with the following supporting documents:
 - i. Application Form including Ownership Certificates (prepared by Stantec);
 - ii. Site Location Plan (prepared by Barr Gazetas);
 - iii. Plans and Drawings (prepared by Barr Gazetas);
 - iv. Landscaping Plans (prepared by Concept Landscape Architects);
 - v. CIL Questions Form (prepared by Stantec);
 - vi. Air Quality Assessment (prepared by Stroma Built Environment Ltd);
 - vii. Daylight/Sunlight Assessment (prepared by Daylight Sunlight Consulting Ltd);
 - viii. Design and Access Statement (prepared by Barr Gazetas);
 - ix. Drainage Management Plan (prepared by Waterman);
 - x. Energy Strategy Report and Sustainability Statement (prepared by Elkoms Consulting Ltd);
 - xi. Financial Viability Assessment (prepared by Turner Morum);
 - xii. Fire Statement (prepared by Bespoke Fire);
 - xiii. Flood Risk Assessment (prepared by Ardent Consulting Engineers);

- xiv. Foul Sewage Assessment (prepared by Waterman);
- xv. Framework Travel Plan (prepared by Waterman);
- xvi. Heritage Statement (prepared by Montagu Evans);
- xvii. Landscape Design Statement, Initial Landscape Specification and Urban Greening Factor Report and Calculations (prepared by Concept Landscape Architects);
- xviii. Noise Impact Assessment (prepared by Acoustics Plus)
- xix. Servicing and Refuse Management Plan (prepared by Waterman);
- xx. Statement of Community Involvement (prepared by Your Shout);
- xxi. Transport Assessment (prepared by Waterman);
- xxii. Tree Report and Tree Protection Plan (prepared by Andrew Day Consultancy);
and
- xxiii. Utilities Report (prepared by Elkoms Consulting Ltd)

1.6 The Planning Statement is structured as follows:

- Section 2 details the Site and surroundings and relevant planning history;
- Section 3 summarises the pre-application engagement that has taken place with prior to the submission of the application;
- Section 4 outlines the proposals;
- Section 5 summarises the relevant development planning policies and other material considerations;
- Section 6 details the key planning issues relevant to the proposals; and
- Section 7 concludes.

2 Site and Surroundings

- 2.1 The Site is located at 231 Watford Road, Harrow, HA1 3TU and extends to 0.24 hectares.
- 2.2 The Site is occupied by the Mumbai Junction restaurant, a part one and part two storey building. The existing building is set back from Watford Road by a large area of car parking, which wraps around the building from the east to the south.
- 2.3 The Site is located to the west of the John Lyon roundabout. Vehicular and pedestrian access is made from the east of the Site, from the service road which runs alongside Sudbury Court Drive and Watford Road.
- 2.4 The Site is bound to the north by Formula One Autocentres; to the east by Watford Road and the John Lyon roundabout; to the south by residential properties along Sudbury Court Drive; and to the west by residential properties along Amery Road.
- 2.5 The surrounding area is predominately residential in nature, although there is an autocentre directly to the north and commercial uses along Watford Road to the south of the John Lyon roundabout. Other nearby uses include Harrow School, Northwick Park, Northwick Park Golf Course and Northwick Park Hospital to the north and Sudbury Court Park/Pasture Park Pass and Sudbury Hill Park to the south. Harrow Town Centre is located approximately 2.5km north of the Site.
- 2.6 The Site is not located within a Conservation Area and there are no listed buildings within the immediate vicinity. The Sudbury Court Conservation Area is located to the east of the Site on the opposite side of the John Lyon roundabout. The nearest listed building is the Grade II listed 96 and 98 Sudbury Court Road located approximately 0.4km south of the Site.
- 2.7 The site has a PTAL rating of 1b. The nearest underground and mainline railway stations are as follows:
 - South Kenton mainline and underground – approximately 1km to the east;
 - Northwick Park mainline – approximately 1.3km to the north;
 - Sudbury Hill mainline – approximately 1.4km to the north-west;
 - Sudbury Hill underground – approximately 1.5km to the north-west;
 - North Wembley mainline and underground - approximately 1.6km to the south-east; and
 - Sudbury & Harrow Road mainline – approximately 1.6km to the south
- 2.8 The nearest bus stops are located on Watford Road approximately 0.2 km north of the Site and provide buses towards Harrow, Harrow Weald, Brent Cross and Dormers Wells.
- 2.9 The site is located within the Brent Air Quality Management Area.
- 2.10 The site is located within Flood Zone 1 (Rivers and Sea), an area of low probability of flooding. There is an area of Flood Zone 3a (Surface Water) to the east of the Site along Watford Road.

Planning History

2.11 Table 2.1 below sets out the Site's planning history

Table 2.1 Site Planning History

Ref.	Development description	Decision	Date
18/4682	Certificate of lawful use for the existing use of the premises as a restaurant (Use class A3)	Granted	04/01/2019
18/2509	Certificate of lawfulness for existing use of the premises as a restaurant (Use Class A3)	Refused	20/08/2018
06/0154	Replacement and extension of side boundary fencing, installation of timber decking area to existing side patio area, new playground equipment to rear, extension of existing rear patio area with loss of one car-parking space and erection of fencing to rear of public house	Granted	31/03/2006
04/1860	Installation of telecommunications equipment comprising ground-floor-level cabinet and 10m high, stand-alone pole with 3 antennas	Refused	06/08/2004
87/2415	Erection of side and rear extensions to form toilets, conservatory and enlarged kitchen	Approved	22/12/1987

3 Pre-application Engagement

- 3.1 The proposals follow extensive pre-application engagement with the LBB planning officers throughout 2020 and 2021; presentation of the proposals at a LBB Design Review workshop in June 2021; and public consultation in June-July 2021.
- 3.2 A summary of pre-application discussions and the response by the Applicant during the design development of the proposals is set out below, with further detail provided in the Design and Access Statement ('DAS') and the Statement of Community Involvement.

Pre-application engagement with LBB

Pre-app meeting 1 – September 2020



- 3.3 Initial pre-application advice was sought in July 2020 (ref: 20/0185/PRE) for the proposed demolition of the existing building and the erection of a part 3, part 4, part 5 and part 6 storey building providing 42 Class C3 residential units; 420sqm of either A1 retail, A2 professional services or D1 medical/ health floorspace at the ground floor; and other works including amenity space, car and cycle parking and refuse storage.
- 3.4 The written pre-app response was received on 10th September 2020 and the pre-app meeting took place on 5th October 2020.
- 3.5 Key feedback from LBB officers at pre-app 1 included:
- No objection in-principle to the loss of the restaurant use and the introduction of housing in this location is supported in a predominately residential area.
 - Proposed height, bulk and mass of the development not considered appropriate, and the relationship along the Site's northern segments appears cramped.
 - A Retail Impact Assessment is needed as the proposals include a retail use outside a designated town centre.
 - 50% of the dwellings should be affordable and a financial viability appraisal will need to be submitted to demonstrate that the maximum reasonable amount of affordable housing has been delivered on site.
 - Should provide as close to 25% family-sized units as possible.
 - Level of hardstanding proposed to accommodate car parking is not considered favourable. Efforts should be made to reduce the overall level and number of parking spaces to the rear of the property and to increase the level of green and natural amenity space.
 - Concern regarding the loss of the existing building on the Site as it makes a broadly positive or neutral contribution to the streetscene and could be considered a non-designated heritage asset. A Heritage Statement will therefore be needed.



Design meeting 1 – November 2020

- 3.6 Following pre-app 1, the proposals were revised. Revised design drawings were submitted to LBB on 18th November 2020 and a further meeting took place with LBB's Design Officer on 25th November 2020.
- 3.7 Key feedback from the LBB Design Officer at design meeting 1 included:
- Significant improvement in the overall scheme, acknowledging the clear distinction between the top and lower base.
 - The fluted profile and contemporary take on tiles at upper levels of the block was supported and the use of render was generally discouraged.
 - **The Applicant should consider what the building will look like at night.**
 - Accepted that the ground floor needs to be quite solid and would be articulated with expression of frame.
 - The majority of the forecourt is still parking, and landscaping will therefore be important and should show how the boundary edge is treated to the front and how the parking area will be gated/secured.
 - The rationalisation of unit types was acceptable.
 - There are 11 units off the core and currently no way to bring natural light into corridor and the Applicant should look for a way to bring light in or separate the building out into smaller cores.
 - **The upper balconies to the roof element should perhaps have a different look than the lower balconies, reflecting the open corners.**




Pre-app meeting 2 – March 2021

- 3.8 Further pre-application advice was sought from LBB in December 2020 in order to discuss the revised proposals (ref: 20/0345/PRE).
- 3.9 The revised proposals sought to address the previous pre-application discussions. The key changes to the proposals were:
- The ground floor commercial use was removed and the number of dwellings increased to 45. 
 - The number of three-bedroom dwellings increased from five to eight, representing 18% of the total units, compared to the 12% previously proposed. 
 - The parking to the rear of the building was replaced with private gardens and shared communal spaces.
 - The number of parking spaces was reduced to 27 spaces, allowing more of the site to be provided for shared communal space and private gardens.
 - The communal space increased from 110sqm to 450sqm and a Local Area for Play (LAP) was provided.
 - The cycle stores were enlarged to meet Brent standards and provide 83 spaces via a mixture of Sheffield stands and two-tier storage rack systems.
 - The building was moved away from the northern boundary of the Site.

- Pedestrian routes were provided to the front and rear of the proposals with planting separating pedestrians from vehicles to the front of the building.
- 3.10 The written pre-app response was received on 4th March 2021 and the second pre-app meeting took place on 9th March 2021.
- 3.11 Key feedback from LBB Officers at pre-app 2 included:
- The principle of the redevelopment of the site to provide new homes was considered acceptable.
 - **The maximum height of six storeys was not considered appropriate in the area.**
 - The number of three bed units should be increased.
 - The front elevation at ground floor level appears blank and dominated by the undercroft car park entrances. An active frontage needs to be created with a clearly defined entrance. 
 - The building needs to be sited to ensure that it maintains an appropriate  relationship to neighbours.
 - The front building line protrudes forward of the neighbouring properties and should be set further back.
 - The removal of the level of parking and hardstanding to the rear of the Site is favourable and the proposed parking layout is an improvement on the previous pre-application proposals.
 - The proposed parking provision accords with the maximum parking standards. However, LBB policy states that development should not add to on-street parking demand and a Lambeth-style parking beat survey should be undertaken to justify the proposed level car parking.
 - The 1:2 rule in SPD2 should be applied to the relationship with no.135 Sudbury Court Drive.


Design meeting 2 – May 2021

- 3.12 Following feedback from the two pre-application meetings and the previous design meeting, a second design meeting took place on 25th May 2021.
- 3.13 Key feedback from LBB Officers at design meeting 2 included:
- The ground floor to the left hand side has been activated but there still is not enough active frontage as the front entrance needs to be legible and celebrated.
 - The proposed percentage of three-bedroom dwellings is below LBB's requirement of 25% but will be considered in the viability of the scheme.
 - The right-hand side of the building at the upper top floor level needs to appear secondary to the main element of the building, perhaps stepping down.
 - There is potential to amend the design to include potential redevelopment of neighbouring site in massing terms to see this in the round plus also setting the amended sketch against the current mass.
 - The forecourt should be green/ softened as much as possible.

- The materials reflect the tonality of the Conservation Area. 
- In terms of the number of units served from a single core, LBB are generally willing to make some exception to the 8 unit maximum rule, but any opportunity to introduce light/ air into a core serving more than 8 units is encouraged.
- The impact of proximity of the residential units to the sub-station needs to be assessed.
- The proposed development needs to be assessed against the 45 degree rule in SPD1.

Design meeting 3 – August 2021

3.14 A third design meeting took place on 19th August 2021. Key Feedback from LBB Officers at design meeting 3 included:

- Remove the top 2 flats near the Formula One Autocentre site to the north.
- Increase the number of three-bedroom dwellings to a minimum of 20%. 
- The frontage should be activated as much as possible and the formal symmetry of the entrance should be maintained.

Brent Design Review Workshop

3.15 In addition to the pre-application meetings and design meetings with LBB, the Applicant also presented the draft proposals at a Brent Design Review workshop on the 28th June 2021.

3.16 Key feedback from the Design Review Workshop included:

- The design should focus on adapting the form of the building to capture natural energy and allow natural light and air into the building.
- The form should be adapted to maximise available surface area to capture natural energy.
- Materials with low embodied carbon should be used wherever possible and the relationship between the height and foundations should be considered as a taller scheme will require a more robust and carbon intensive foundation.
- The 'knuckle' flat at the northern elevation has a poor aspect over the car park and is unlikely to have sufficient day light and sunlight.
- The number of single aspect units is low but it is believed that any single aspect units should be avoided.
- The internal layout at ground floor requires further work to ensure that it can accommodate many functions and residential entrances whilst also being a pleasant and healthy space.
- Not considered appropriate to use adjacent on-street parking as the parking strategy.

- The frontage onto the John Lyon roundabout is moving in the right direction but it was recommended that the legibility of the ground floor functions and distribute activity across it.
- The distinction between upper and middle floors should be softened through the choice and position of different materials.
- It was recommended that the height at the southern boundary is lowered and explore how the massing can be adjusted to ensure the current height suits the northern site boundary.
- The landscape strategy should focus on delivering a lush and verdant landscape that can create a cooler microclimate. The architecture and landscape strategy could be more strongly connected through adding wall planting to the northern flank wall from either ground or first floor.



Community and stakeholder engagement

- 3.17 The Applicant has also carried out engagement with the public and elected stakeholders, as detailed below.

Consultation with Elected Representatives

- 3.18 Elected representatives were contacted to brief them on the proposals, to alert them to the forthcoming consultation and to offer a meeting to discuss the plans in more detail.

- 3.19 A meeting with Cllr McLennan and Cllr Robert took place on 10th August 2021.



Public Consultation

- 3.20 A range of community groups, businesses and other key stakeholders, including the Sudbury Court Residents' Association, were invited to public consultation events and offered either a one-to-one meeting or further information.

- 3.21 The consultation was publicised via the distribution of a letter on 14th June 2021. The objective of the letter was to publicise the project website and online Q&A events, to communicate information about the scheme, and to encourage local residents to share their views about the proposal.

- 3.22 The online Q&A events were held on the community UK platform, via a web browser on the following dates:

- Wednesday 23rd June at 7pm.
- Thursday 24th June at 1pm.

- 3.23 Representatives from the applicant, the architect, and the planning consultant were present throughout the online Q&A events. 91 households (measured by IP address) participated over the course of the three sessions. There were 126 questions received at the online Q&A events, with 68 responses to the online feedback form on the website and 43 written comments. Feedback related to the following themes:

- Height of the building.

- Local infrastructure.
- Affordable housing.
- Traffic.



3.24 Further information can be found in the Statement of Community Involvement.

Revisions to the proposals in response to pre-application feedback

3.25 The DAS details how the proposals have been revised to respond to pre-application feedback received and are therefore not repeated in the Planning Statement.


4 The Proposals

4.1 The proposals are made for:

'Demolition of the existing building and the erection of a part three, part four and part five storey building to provide residential dwellings (Use Class C3); car and cycle parking; landscaping, amenity space and play area; and refuse storage and other associated works.'


4.2 The proposals will provide a part three, part four and part five storey building. A total of 43 units will be provided and the proposed unit mix is as follows:


- 13 x 1 bed flats;
- 21 x 2 bed flats; and
- 9 x 3 bed flats.

4.3 Larger three bedroom family sized units are split across all floors, equating to 21% of the total units. 

4.4 All units are for market sale. Please refer to the Viability Statement prepared by Turner Morum for further information.

4.5 All units meet London Plan internal space standards. 10% of the units will be wheelchair accessible.

4.6 The ground floor two and three bed units are provided with at least 50sqm of private amenity space and the ground floor one bed units are provided with at least 20sqm, in line with LBB's private amenity space standards. Upper floor units are provided with private balconies which meet or exceed the London Plan private amenity space standards. The shortfall in private amenity space for the upper floor units, when assessed against LBB's standards, is offset by the communal amenity space. Communal amenity space is provided via a fourth floor roof terrace and a communal garden to the western side of the Site, the communal garden also incorporates a children's play area. 

4.7 Vehicular access into the Site will continue via the two existing vehicular access points from the service road which runs alongside Sudbury Court Drive and Watford Road. 

4.8 In terms of car parking, 18 parking spaces are provided via an undercroft, including two disabled parking bays.

4.9 Electric car charging provision will be provided to meet the London Plan standards of 20% active from the outset and 80% passive.

4.10 A total of 80 long-stay cycle parking spaces are provided within the ground floor of the building, including six spaces for larger cycles in accordance with TfL guidance. Four short-stay cycle parking spaces are provided externally to the front of the building.

4.11 A bin store is provided within the ground floor of the building, with access doors to the front of the building.

4.12 Further information regarding the design of the proposals is included in the DAS, as well as the other supporting documents and plans.

5 Planning Policy Context

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of planning applications is made in accordance with the Development Plan unless material considerations indicate otherwise.

5.2 The Development Plan for the Site comprises:

- The London Plan (2021);
- Brent Core Strategy (2010);
- Brent Development Management Policies (2016); and
- Brent Policies Map.



5.3 Other material considerations include the Draft Brent Local Plan – Main Modifications Version (July 2021); the Brent Design Guide SPD (2018); the Brent Residential Extensions and Alterations SPD (2018); the Brent Waste and Recycling Storage and Collection Guidance for Residential Properties (2013); the Mayor of London Housing SPG (2016); the Mayor of London Affordable Housing and Viability SPG (2017); the Mayor of London Sustainable Design and Construction SPG (2014); the Mayor of London Play and Informal Recreation SPG (2012); the Mayor of London Character and Context SPG (2014); the National Planning Policy Framework (NPPF) (2021); and the National Planning Practice Guide (NPPG) (2021).

The London Plan (2021)

5.4 The London Plan ('LP') was adopted in March 2021 and sets out the spatial development strategy for Greater London.

5.5 Key LP policies relevant to the determination of this application are listed below:

- GG1 (Building strong and inclusive communities);
- GG2 (Making the best use of land);
- GG3 (Creating a healthy city);
- GG4 (Delivering the homes Londoners need);
- GG6 (Increasing efficiency and resilience);
- D2 (Infrastructure requirements for sustainable densities);
- D3 (Optimising site capacity through the design-led approach);
- D4 (Delivering good design);
- D5 (Inclusive design);
- D6 (Housing quality and standards);
- D7 (Accessible housing);
- D12 (Fire safety);
- D14 (Noise);
- H1 (Increasing housing supply);
- H4 (Delivering affordable housing);

- H5 (Threshold approach to applications);
- H6 (Affordable housing tenure);
- H7 (Monitoring of affordable housing);
- H10 (Housing size mix);
- S4 (Play and informal recreation);
- HC1 (Heritage conservation and growth);
- G5 (Urban greening);
- G6 (Biodiversity and access to nature);
- G7 (Trees and woodland);
- SI 1 (Improving air quality);
- SI 2 (Minimising greenhouse gas emissions);
- SI 4 (Managing heat risk);
- SI 12 (Flood risk management);
- SI 13 (Sustainable drainage);
- T2 (Healthy streets);
- T4 (Assessing and mitigating transport impacts);
- T5 (Cycling);
- T6 (Car parking);
- T6.1 (Residential parking); and
- T7 (Deliveries, servicing and construction).

Brent Core Strategy (2010)

5.6 The Brent Core Strategy ('BCS') was adopted in July 2010 and sets out the overarching spatial strategy and key planning policies which will shape new development in the Borough.

5.7 Key BCS policies relevant to the determination of this application are listed below:

- CP1 (Spatial development strategy);
- CP2 (Population and housing growth);
- CP5 (Placemaking);
- CP6 (Design and density in place shaping);
- CP17 (Protecting and enhancing the suburban character of Brent);
- CP19 (Brent strategic climate change mitigation and adaptation measures); and
- CP21 (A balanced housing stock).


Brent Development Management Policies (2016)

5.8 The Brent Development Management Policies ('BDMP') was adopted in November 2016 and contains detailed planning policies which will guide the future development of the Borough.

5.9 Key BDMP policies relevant to the determination of this application are listed below:

- DMP 1 (General development management policy);
- DMP 7 (Brent's Heritage Assets);
- DMP 9 A (Managing Flood Risk);
- DMP 9 B (On Site Water Management and Surface Water Attenuation);
- DMP 12 (Parking);
- DMP 15 (Affordable Housing);
- DMP 13 (Movement of Goods and Materials);
- DMP 18 (Dwelling Size and Residential Outbuildings); and
- DMP 19 (Residential Amenity Space).




Draft Brent Local Plan

5.10 LBB submitted the Draft Brent Local Plan ('DBLP') for Examination in March 2020 and the Examination Hearings took place during September and October 2020. LBB consulted on the Main Modifications to the DBLP from the 8th July – 19th August 2021. The DBLP is at an advanced stage of preparation and weight can therefore be attached to the draft policies. 



5.11 Key DBLP policies relevant to the determination of this application are listed below:



- DMP1 (Development management general policy)
- BP4 (North West);
- BD1 (Leading the way in good urban design);
- BH1 (Increasing housing supply in Brent);
- BH5 (Affordable housing);
- BH6 (Housing size mix);
- BH13 (Residential amenity space);
- BHC1 (Brent's heritage assets);
- BG11 (Green and blue infrastructure in Brent);
- BG12 (Trees and woodlands);
- BSUI1 (Creating a resilient and efficient Brent);
- BSUI2 (Air quality);
- BSUI3 (Managing flood risk)
- BSUI4 (On-site water management and surface water attenuation);
- BT1 (Sustainable travel choice); and
- BT2 (Parking and car free development).

6 Planning Assessment


- 6.1 Having regard to the pre-application discussions with LBB and local stakeholders and the Site's policy context, the key planning issues relating to the proposals are considered to be:
- i. Principle of development and loss of the existing Class E use;
 - ii. Affordable housing;
 - iii. Unit mix;
 - iv. Design, scale and massing; 
 - v. Standard of proposed residential accommodation;
 - vi. Impact upon residential amenity; 
 - vii. Heritage;
 - viii. Transport impacts;
 - ix. Energy and sustainability; and
 -  x. Landscaping, trees and urban greening.

Principle of development and loss of the existing Class E use

- 6.2 The LP and LBB development framework identify a significant need for additional housing to meet London and borough-wide housing needs. The LP sets minimum ten-year net housing completion targets for each London Borough. The ten-year target for LBB is 23,250 additional dwellings, equating to 2,325 dwellings per annum. DBLP Policy BH1 reflects this target. DBLP Policy BP4 sets a minimum target of 2,285 additional homes by 2041 in the North West area of Brent where the Site is located. The proposed development could assist LBB in meeting their housing targets. 
- 6.3 In order to ensure that the ten-year housing targets are achieved, LP Policy H1 states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions. The redevelopment of brownfield sites is also strongly supported by National policy.
- 6.4 The Site is a brownfield site within a predominantly residential area and is accessible to local services, schools and public transport connections. It is therefore considered to be a suitable site for residential development. During pre-application discussions, LBB Officers advised that the introduction of housing in this location was supported, as the Site is located in a predominantly residential area. 

- 6.5 BDMP Policy DMP 4 supports the loss of isolated shop units outside designated town centres where the unit is within 400 metres of equivalent alternative provision and is either unviable or will provide community facilities for which there is a demonstrable need. DBLP Policy BE6 largely replicates Policy DMP 4 but does add that the proposal should not result in a harmful break in the continuity of retail frontages. 
- 6.6 The Site is not within a town centre or parade of shops, it is therefore viewed as an isolated shop unit. The Site is not covered by any designations in the Brent Development Plan that protect the current Class E use. Ashutosh restaurant is located at 205 Watford Road, approximately 120 metres to the south of the Site, and provides alternative equivalent provision to the restaurant currently on site. As the existing building is an isolated unit, the loss of the unit would not result in a harmful break in the continuity of a retail frontage. The proposals are therefore in accordance with BDMP Policy DMP 4 and DBLP Policy BE6.
- 6.7 During pre-application discussions, LBB Officers also advised that there was no in principle objection to the loss of the restaurant use. 
- 6.8 The principle of residential redevelopment of the Site and the loss of the restaurant use is therefore considered to be acceptable and was accepted by LBB Officers during pre-application discussions.

Affordable housing

- 6.9 **LP Policy H4 advises that the strategic target is for 50% of all new homes delivered across London to be genuinely affordable.** This aligns with BCS Policy CP2 and BDLP Policy BH5 which sets the target that 50% of new homes delivered in the borough will be affordable. The maximum reasonable amount of affordable housing will be sought on individual residential and mixed use developments on sites with the capacity to provide 10 or more homes. 
- 6.10 Specific measures to achieve this aim include (amongst other criteria): requiring major developments which trigger affordable housing requirements to provide affordable housing through the threshold approach as set out in LP Policy H5. Policy H4 also states that affordable housing should be provided on site and must only be provided off-site or as a cash in lieu contribution in exceptional circumstances.
- 6.11 Policy H5 sets the threshold level of affordable housing on gross residential development at 35% for sites that are not public sector land or industrial sites. To follow the Fast Track Route of the threshold approach, applications must meet all of the criteria listed in LP Policy H5 Part C, including meeting or exceeding the threshold level of affordable housing without public subsidy.
- 6.12 Where an application does not meet the requirements set out in Part C it must follow the Viability Tested Route. This requires detailed supporting viability evidence to be submitted in a standardised and accessible format as part of the application. BDMP Policy DMP 15 states that where a reduction to affordable housing obligations is sought on economic viability grounds, developers should provide a development appraisal to demonstrate that schemes are maximising affordable housing output.

- 6.13 It is not proposed to provide affordable housing as part of the scheme due to scheme viability. A Financial Viability Study undertaken by Turner Morum LLP has been submitted with the application to demonstrate why it is not viable to do so.

Unit mix

- 6.14 LP Policy H10 states that schemes should generally consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to the following:
- 1) robust local evidence of need where available or, where this is not available, the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment.
 - 2) the requirement to deliver mixed and inclusive neighbourhoods.
 - 3) the need to deliver a range of unit types at different price points across London.
 - 4) the mix of uses in the scheme.
 - 5) the range of tenures in the scheme.
 - 6) the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity.
 - 7) the aim to optimise housing potential on sites.
 - 8) the ability of new development to reduce pressure on conversion, subdivision and amalgamation of existing stock.
 - 9) the need for additional family housing and the role of one and two bed units in freeing up existing family housing.
- 6.15 BCS Policy CP 2 and DBLP Policy BH6 state that at least 25% of new homes should be family sized (3 bedrooms or more). Policy BH6 states that exceptions to the provision of family sized dwellings will only be allowed where the application can show that: the location or characteristics of the development are such that it would not provide a high quality environment for families, or its inclusion would fundamentally undermine the development's delivery of other Local Plan policies.
- 6.16 The proposed housing mix is:
- 13 x 1 bed flats (30%);
 - 21 x 2 bed flats (49%); and
 - 9 x 3 bed flats (21%).
- 6.17 Family sized housing (3 or more beds) will comprise 21% of the proposed unit mix. The unit mix is considered an appropriate response to the constraints of the Site and other policy requirements. On balance, the benefits of the scheme in delivering additional homes, and providing flats in an area dominated by houses, are considered to outweigh any harm identified with falling slightly below the target for family sized units.

Design, scale and massing

- 6.18 LP Policy D3 expects all development to make the best use of land by following a design-led approach that optimises the capacity of sites. This includes responding to the sites context and capacity for growth, and existing and planned supporting infrastructure capacity as expressed by LP Policy D2. Policy D2 states that the density of development proposals should consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels, and be proportionate to the site's connectivity and accessibility by walking, cycling, and public transport to jobs and services.
- 6.19 LP Policy D3 goes on to state that proposals should enhance the local context by delivering buildings and spaces that positively respond to local distinctiveness through layout, orientation, scale, appearance and shape. Development is also expected to achieve safe, secure and inclusive environments, and be of a high architectural quality that responds to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality. DBLP Policy BD1 aligns with LP Policy D3.
- 6.20 BCS Policy CP 17 states that the distinctive suburban character of Brent will be protected from inappropriate development and that the council will bring forward design guidance that limits development, outside of the main town centres and away from corner plots on main road frontages, which would erode the character of suburban housing.
- 6.21 The proposed development aims to make the best use of the Site by optimising the density of the Site through the design-led approach detailed in LP Policy D3.
- 6.22 The scale of the proposal has evolved through careful testing of the massing and composition, whilst incorporating officer feedback from the pre-app and design meetings, the Design Review workshop and from residents. During pre-application discussions, LBB officers advised that the development should not exceed five storeys adjacent to the northern boundary or three storeys on the southern boundary. The proposed development accords with this.
- 6.23 The proposed building is positioned so that adequate separation distances are maintained with neighbouring sites, in line with the Brent Design Guide Supplementary Planning Document ('Brent SPD1'), this is discussed in detail in paragraphs 6.43-6.53 below and in the DAS.
- 6.24 The proposed building massing follows the site line around Watford road to create a relationship with the adjacent buildings, and any possible future developments of the neighbouring site. The proposed development respects the established building line of Sudbury Court Drive and Watford Road. No.135 Sudbury Court Drive is considered an outlier as it does not follow the building line of the rest of Sudbury Court Drive properties. This point was agreed during pre-application discussions with LBB (see page 14 and 18 of the DAS).
- 6.25 The proposed building addresses the John Lyon roundabout. The proposed building maintains the same level of separation from the John Lyon roundabout as the existing

buildings on the other sides of the roundabout, and the design aims to strengthen the sense of place through its orientation and scale and the building.

- 6.26 Activating the ground floor frontage was a key point of discussion during the pre-application meetings with LBB. The parking spaces originally proposed to the front do not feature in the final design. The entrances to the building and the landscaping to the front have also been revised to better activate the ground floor frontage.
- 6.27 The design of the roof takes its cues from the roof profiles of nearby 239 and 245 Watford Road, with the roof enclosing an additional storey.
- 6.28 The design of the proposed development has been considered in both stand-alone terms and with due consideration to the potential for future development on the adjacent Formula One site to the north, which is a low rise commercial site that could feasibly come forward as a residential development site in the future.
- 6.29 Further assessment of the development's design, appearance and materials is set out within the supporting DAS.

Standard of proposed residential accommodation

Internal space standards

- 6.30 LP Policy D6 states that housing developments are required to meet the minimum private internal space standards set out in Table 3.1 and should be of high quality design and provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.
- 6.31 All units meet or exceed the minimum internal space standards set out in LP Table 3.1 in accordance with LP Policy D6.

Accessible Units

- 6.32 LP Policy D5 states that development proposals should achieve the highest standards of accessible and inclusive design. Measures to achieve this aim include the following (amongst other criteria): being convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment; being able to be entered, used and exited safely, easily and with dignity for all; and being designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.
- 6.33 LP Policy D7 requires at least 10% of dwellings to meet Building Regulation requirement M4(3) 'wheelchair user dwellings' and all other dwellings to meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.
- 6.34 M4(3) is divided into two categories - wheelchair accessible homes (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable

homes (a home that can easily be adapted to meet the needs of a household including wheelchair users). Planning Practice Guidance states that Local Plan policies for wheelchair accessible homes should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling (generally this will be social and affordable rented units), otherwise M4(3) dwellings should be wheelchair adaptable.

- 6.35 The proposed development accords with LP Policy D7 by providing four wheelchair adaptable dwellings, which equates to 10% of the total proposed units. The remaining 39 units meet Building Regulation M4(2) 'accessible and adaptable dwellings'.
- 6.36 All units are accessed via step-free access and the upper floors are served by an evacuation lift in accordance with LP Policy D5.
- 6.37 Six of the long-stay cycle spaces are capable of accommodating larger cycles, including adapted cycles for disabled people. Two disabled car parking spaces are also provided.
- 6.38 The proposal therefore fully complies with LP Policy D5 and D7.

Private amenity space

- 6.38.1 LP Policy D6 advises where there are no higher local standards in the borough Development Plan Documents, a minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m.
- 6.38.2 BDMP Policy DMP19 and DBLP Policy BH13 state that all new dwellings will be required to have external private amenity space of a sufficient size and type to satisfy its proposed residents' needs and that this is normally expected to be 20sqm per flat and 50sqm for family housing (including ground floor flats). Paragraph 10.39 of the BDMP states that where sufficient private amenity space cannot be achieved to meet the full requirement of the policy, the remainder should be supplied in the form of communal amenity space and that the calculation of amenity space does not include any parking, cycle or refuse and recycling storage areas.
- 6.38.3 Each of the proposed ground floor units exceeds the private amenity space standards set out in BDMP Policy DMP19, with the two 1-bed units and one 2-bed unit provided with over 20sqm of private amenity space and the two 3-bed units provided with over 50sqm of private amenity space.
- 6.38.4 All units on the upper floors are provided with private amenity space in the form of balconies or terraces that meet the private amenity space standards set out in LP Policy D6. The shortfall in private amenity space for the upper floors, when assessed against BDMP Policy DMP19 standards, is offset by the communal garden at ground floor and the fourth floor roof terrace. This is in line with BDMP paragraph 10.39.
- 6.38.5 The proposal therefore accords with LP Policy D6, BDMP Policy DMP19 and DBLP Policy BH13.

Communal amenity space and play space

- 6.39 LP Policy S4 requires residential developments to incorporate good-quality, accessible play provision for all ages and states that at least 10sqm of play space should be provided per child.
- 6.40 Based on the proposed unit mix, the GLA calculator suggests that 14.8 children are expected. Applying the LP standard of 10sqm of play space per child, the proposals should provide a minimum of 148sqm of play space.
- 6.41 The proposal includes a 368sqm communal garden and a 148sqm children's play area at ground floor level and a 79.9sqm terrace at fourth floor level.
- 6.42 Overall, it is considered that the proposed communal amenity space is in accordance with the LP standards.

Impact upon residential amenity

Outlook, overlooking and privacy

- 6.43 LP Policy D3 states that all developments must deliver appropriate outlook, privacy and amenity.
- 6.44 LP Policy D6 requires housing development to maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B in Policy D3 Optimising site capacity through the design-led approach than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.
- 6.45 The proposals include no single aspect flats facing north. Additional windows have been added to the flats side walls to avoid single aspect flats as much as possible, whilst taking into account overlooking to neighbouring properties.
- 6.46 The Brent SPD1 new development to provide adequate privacy and amenity for new residents and protect those of existing ones. To achieve this, SPD1 sets out a number of requirements:
- A distance of 9m should be maintained between gardens and habitable rooms or balconies ('the 9m rule').
 - A distance of at least 18m should normally maintained between directly facing habitable room windows, except where the existing character of the area varies from this ('the 18m rule').
 - The building envelope should be set below a line of 30 degrees from the nearest rear habitable room window of an adjoining existing property, measured from a height of two metres above floor level ('the 30 degree rule');
 - Where a proposed development adjoins private amenity/ garden areas then the height of new development should normally be set below a line of 45 degrees at the garden edge, measured from a height of two metres ('the 45 degree rule');

- The 2:1 guidance for two storey extensions outline in the Brent Residential Extensions and Alterations Supplementary Planning Document ('SPD') applies for commercial developments next to residential as well as between residential developments. This requires new buildings and extensions to not extend further beyond the neighbouring building line than half the distance to the centre of the nearest habitable room ('the 2:1 rule').
- 6.47 The DAS, prepared by Barr Gazetas, assesses the proposed development against the requirements of SPD1. The results are also summarised below.
- 6.48 The proposed building is located 9m from the garden boundaries of no.15 and no.17 Amery Road to the rear in the west. This boundary is heavily screened by existing trees which will remain. The gardens of no.15 and no.17 Amery Road are approximately 24m in length resulting in a significant separation distance between the west elevation of the proposed development and the rear elevation of those properties. There are no habitable room windows in the proposed development's southern elevation at first and second floor level and the third and fourth floors step back from the boundary with no.135 Sudbury Court Drive. The ground floor habitable room windows of the proposed development are not 9m from the boundary of no.135 Sudbury Court Drive. However, this is not considered to have any impact on outlook, overlooking or privacy, as at this point the proposed development is adjacent to no.135's side access and not the garden area and there is a perimeter wall and an existing substantial tree screen separating the proposed development and no.135. Also, no. 135 does not have any habitable windows in its side elevation.
- 6.49 The distance between the proposed development and the properties on the opposite side of the John Lyon roundabout and to the rear on Amery Road is over 18m. The proposed development therefore complies with the 18m rule (see page 15 of the DAS).
- 6.50 The Site adjoins the private gardens of no.15 and no.17 Amery Road to the east and both properties have rear windows facing towards the Site. The proposed development is set below a line of 30 degrees from the rear habitable room windows of no.15 and no.17 Amery Road and the 30 degree rule is therefore met (see page 20 of the DAS).
- 6.51 The Site adjoins the private gardens of no.15 and no.17 Amery Road to the east and no.135 Sudbury Court Drive to the south. The proposed development is set below a line of 45 degrees at the garden edge of no.15 and no.17 Amery Road and the 45 degree rule is therefore met. The proposed development adheres to the 45 degree rule when assessed from the rear garden boundary of no.135 Sudbury Court Drive but it does not adhere to the 45 degree rule when assessed from the side boundary (see page 20 of the DAS). However, the side windows to no.135 all appear to be non-habitable windows and there is a high level of screening due to the existing trees along the boundary. There are also no windows in the proposed development's southern flank elevation at first or second floor level and there is therefore considered to be no impact on privacy or overlooking of no.135.

- 6.52 The 2:1 rule has been assessed in relation to the nearest ground floor and first floor habitable windows of no.135 Sudbury Court Drive to the south (see page 21 of the DAS). The proposals comply with the 2:1 rule when assessed against the ground floor window. When assessed against the first floor window, the new massing protrudes 269mm further to the back than specified by the 2:1 rule. However, 269mm is considered a negligible amount and it is arguable that the development doesn't impact negatively on no.135 Sudbury Court Drive's windows or garden. The Daylight Sunlight Report demonstrates that the new massing does not overshadow no.135 (see the Daylight and sunlight section below).
- 6.53 The proposals have been designed to protect the amenities of existing neighbouring occupiers and future occupiers of the Site and are therefore considered to comply with LP Policy D3 and D6 and LBB SPD1.

Daylight and sunlight

- 6.54 LP Policy D6 states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.
- 6.55 The Daylight Sunlight Report submitted with this application assesses the impacts of the proposals on daylight sunlight within the proposed units and on surrounding properties. The tests were undertaken in accordance with BRE guidelines.
- 6.56 Key findings in relation to daylight sunlight impacts on surrounding properties are:
- 135 Sudbury Court Drive to the south of the Site has windows in the side elevation facing towards the Site. However, these windows serve non-habitable rooms and BRE guidelines are clear that the effects on daylight and sunlight to non-habitable rooms are not required for testing. The front and rear facing windows serve habitable rooms, which will be unaffected by the proposed development due to the proposed layout and stepping down of the massing adjacent to 135 Sudbury Court Drive. Therefore, it is concluded that 135 Sudbury Court Drive will adhere to the BRE guidelines.
 - There are a number of residential properties to the west of the Site on Amery Road. Having undertaken a review of the 25 degree angle test, it is clear that due to the proposed building layout, and the distance between the buildings, that the proposed development adheres to the test. This demonstrates that the occupants within the Amery Road properties will maintain high levels of daylight and sunlight with the proposed development in place.
- 6.57 Key findings in relation to daylight sunlight within the proposed units and external amenity areas are:
- The Average Daylight Factor (ADF) results show that of the 78 rooms tested, 74 (95%) adhere to the BRE guidelines, obtaining ADF levels that either meet or exceed the target levels for the room use.

- Of the 4 rooms falling below ADF targets, these are bedrooms with ADF levels ranging between 0.78% and 0.94%, which are just below the target level of 1.0%. In addition, each bedroom is within a flat with two other bedrooms and a living/dining rooms meeting or exceeding the guidelines.
- The Annual Probable Sunlight Hours (APSH) results show that of the 78 rooms tested, 45 rooms (58%) adhere to the BRE guidelines, obtaining annual sunlight levels in excess of the 25% APSH. This is a considered a good level of adherence given the proposed development has windows facing in all direction, including the north where sunlight is limited.
- The assessment of the sun-on-ground has been undertaken to two amenity areas at ground level. The two areas will both obtain levels of 99.7%, which is well above the target set out in the BRE guidelines.

6.58 The Daylight Sunlight Report concludes that the proposed development satisfies the requirements set out in the BRE guidelines and is therefore acceptable. The proposals therefore comply with LP Policy D6.

Noise

6.59 In order to reduce, manage and mitigate noise to improve health and quality of life, LP Policy D14 states that residential and other non-aviation development proposals should manage noise by:

- 1) avoiding significant adverse noise impacts on health and quality of life;
- 2) reflecting the Agent of Change principle as set out in Policy D13 Agent of Change;
- 3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses;
- 4) improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity);
- 5) separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening, layout, orientation, uses and materials – in preference to sole reliance on sound insulation;
- 6) where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles; and
- 7) promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

6.60 LP Policy D13 relates to the “Agent of Change” and states that development proposals should manage noise and other potential nuisances by:

- 1) ensuring good design mitigates and minimises existing and potential nuisances generated by existing uses and activities located in the area;

- 2) exploring mitigation measures early in the design stage, with necessary and appropriate provisions including ongoing and future management of mitigation measures secured through planning obligations; and
 - 3) separating new noise-sensitive development where possible from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, insulation and other acoustic design measures.”
- 6.61 BDMP Policy DMP1 states that development will be acceptable provided it is not (amongst other things) unacceptably increasing exposure to noise.
- 6.62 The Noise Impact Assessment submitted with this application states that onsite noise measurements show that the front and rear facades experience average noise levels above the upper limit recommended by BS8233 / WHO. The Noise Impact Assessment concludes that glazing systems with acoustic performances for living/kitchen/diners and bedrooms would provide sufficient attenuation to reduce internal noise levels to meet the minimum requirements recommended within ProPG, BS8233:2014 and World Health Organisation (WHO) guidelines.
- 6.63 Passive air intake ventilation in combination with the NIBE ventilation system is proposed for the residential habitable rooms to provide adequate background ventilation and to avoid having to open windows. The Noise Impact Assessment states that ventilators with the relevant acoustic performance would provide sufficient attenuation to reduce internal noise levels to meet the minimum requirements recommended within ProPG, BS8233:2014 and World Health Organisation (WHO) guidelines.

Air quality

- 6.64 LP Policy SI1 states that development proposals should not lead to further deterioration of existing poor air quality, create new areas that exceed air quality limits or create unacceptable risk of high levels of exposure to poor air quality. In order to meet these requirements, development proposals are expected to achieve the following, as a minimum:
- a. be at least Air Quality Neutral.
 - b. use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures.
 - c. submit an Air Quality Assessment to show how the development will meet the requirements.
 - d. proposals in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people should demonstrate that design measures have been used to minimise exposure.

- 6.65 Policy SI1 continues, stating that development proposals should ensure that where emissions need to be reduced to meet the requirements of Air Quality Neutral or to make the impact of development on local air quality acceptable, this is done on-site. Where it can be demonstrated that emissions cannot be further reduced by on-site measures, off-site measures to improve local air quality may be acceptable, provided that equivalent air quality benefits can be demonstrated within the area affected by the development.
- 6.66 BCS Policy CP 19 states that major proposals and proposals for sensitive uses (education, health and housing) in Air Quality Management Areas (AQMA), should submit a Sustainability Statement demonstrating, at the design stage, how sustainable design and construction measures are used to mitigate and adapt to climate change over the intended lifetime of a development.
- 6.67 BDMP Policy DMP1 states that development will be acceptable provided it is not (amongst other things) unacceptably increasing exposure to dust, contamination, smells, other forms of pollution and general disturbance or detrimentally impacting on air.
- 6.68 The key findings of the Air Quality Assessment submitted with this application are:
- In terms of the impact from construction activities, whilst the likely impact of dust soiling and PM10 are negligible, mitigation measures have been listed in Table 22 and are applicable for a high risk site. Implementation of these Best Practice Measures will help reduce the impact of the construction activities. With these mitigation measures enforced, the likelihood of nuisance dust episodes occurring at those receptors adjacent to the development are considered low to negligible.
 - Air quality at the development is all comfortably below the Air Quality Objective, with the highest value being marginally over 80% of the AQO. With respect to existing receptors, only one location on the nearby roundabout exceeded the 40µgm-3 but the contribution from the development is negligible. It is therefore unlikely that the air quality objective will be breached and mitigation would be required via mechanical ventilation.
 - The Air Quality Neutral Transport Assessment for the proposed development demonstrated that it is above the benchmark. As such, the development is not considered air quality neutral in regard to transport emissions and further mitigation measures are required either by on-site measures or by off-setting.
- 6.69 The Air Quality Assessment confirms that the likely impact of dust and PM10 are negligible but recommends that Best Practice Measures are implemented to reduce the impact of the construction activities. This is in line with BDMP Policy DMP1.
- 6.70 Air quality at the development is all comfortably below the Air Quality Objective. Further mitigation measures, either on-site or by off-setting, are required in order for the development to be Air Quality Neutral Assessment in line with LP Policy SI1.
- 6.71 The Site lies within an AQMA. In line with BCS Policy CP 19, an Energy Strategy Report and Sustainability Statement forms part of the application and discusses how

sustainable design and construction measures are to be used to mitigate and adapt to climate change.

Heritage

- 6.72 LP Policy HC1 states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.
- 6.73 BDMP Policy DMP 7 states that proposals for or affecting heritage assets should meet a number of criteria. The following are of relevance to the proposed development:
- a. demonstrate a clear understanding of the archaeological, architectural or historic significance and its wider context; provide a detailed analysis and justification of the potential impact (including incremental and cumulative) of the development on the heritage asset and its context as well as any public benefit;
 - b. provide a detailed analysis and justification of the potential impact (including incremental and cumulative) of the development on the heritage asset and its context as well as any public benefit;
 - c. retain buildings, structures, architectural features, hard Landscaping and spaces and archaeological remains, where their loss would cause harm;
 - d. sustain and enhance the significance of the heritage asset, its curtilage and setting, respecting and reinforcing the streetscene, frontages, views, vistas, street patterns, building line, siting, design, height, plot and planform and ensure that extensions are not overly dominating; and
 - e. contribute to local distinctiveness, built form, character and scale of heritage assets by good quality, contextual, subordinate design, and the use of appropriate materials and expertise, and improving public understanding and appreciation.
- 6.74 The Site is not statutory or locally listed and is not within a Conservation Area. The edge of the Sudbury Court Conservation Area is located to the east of the Site on the eastern side of the John Lyon roundabout and Watford Road.
- 6.75 In the pre-app 1 written response, the existing building was described as making a broadly positive or neutral contribution to the streetscene and could be considered a non-designated heritage asset. It was suggested that a detailed Heritage Statement be provided clearly identifying and justifying the loss of this heritage asset.

- 6.76 A full assessment of the existing building is detailed within the Heritage Statement submitted with this application. The existing building opened as a public house in the late 1950s and the Heritage Statement identifies that the existing building dates from a later phase of the area's build-up and is not very evocative of this period of expansion. Pubs remain extremely common building types, despite the closure or conversion of many, and as stated by Historic England, post-war pubs were built in very high numbers.
- 6.77 The Heritage Statement states that the existing building is not of special interest and therefore not of listable quality at a national level.
- 6.78 Paragraphs 3.11-3.14 of the Heritage Statement assess the existing building against Historic England's list of heritage interests which might contribute to a building acquiring locally listed status. The Heritage Statement concludes that the existing building is not of any interest in terms of archaeological, architectural, artistic, historic or setting. It is therefore below the standards of a local listing and should not be regarded as a non-designated heritage asset.
- 6.79 The design takes cues from the Sudbury Court Conservation Area in the sweeping roof, material palette. The proposed development is not within the Sudbury Court Conservation Area and is not considered to result in any harm to the character or appearance of the Conservation Area. The DAS provides further of analysis of the proposed development and the relationship with the Conservation Area.

Transport impacts

Vehicular, pedestrian and cycle access

- 6.80 LP Policy D3 states that development proposals should encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area.
- 6.81 BDMP Policy DMP1 states that development will be acceptable provided it is satisfactory in terms of means of access for all, parking, manoeuvring, servicing and does not have an adverse impact on the movement network.
- 6.82 The Chartered Institution of Highways and Transportation ('CIHT') document 'Planning for Walking' (2015) defines a 'walkable neighbourhood' as an area with the majority of amenities within 800m walking distance. The document also sets out a desired maximum threshold of 1,600m for walking journeys.
- 6.83 PTAL is a measure which rates locations by distance from frequent public transport services, where PTAL 6b is the highest level of accessibility and PTAL 0 is the lowest level of accessibility. The Site has a PTAL of 1b.
- 6.84 Pedestrian and vehicular access into the Site will continue via the two existing access points from the service road which runs alongside Sudbury Court Drive and Watford Road.

- 6.85 A Transport Statement ('TS') has been submitted with this planning application. Notwithstanding the PTAL score of 1b, the TS states that the Site is well located for access to bus services within a 400m walking distance and rail services within the maximum desirable 1,600m walking distance.
- 6.86 The TS considers the Site as a 'walkable neighbourhood', as defined in CIHT's Planning for Walking (2015), as there are a number of surrounding amenities and sustainable infrastructure measures already in place, demonstrating that walking to and from the Site is a feasible alternative to car use.

Delivery and servicing

- 6.87 As noted above, BDMP Policy DMP1 states that development will be acceptable provided it is satisfactory in terms of means of access for all, parking, manoeuvring, servicing and does not have an adverse impact on the movement network. BDMP Policy DMP13 states that the Council will work with developers to provide the optimum servicing and delivery arrangements for new developments. Wherever possible servicing should be provided off the highway.
- 6.88 LP Policy T7 requires development proposals to facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.
- 6.89 A Servicing and Refuse Management Plan ('SRMP') is submitted with the planning application. This includes an assessment of the delivery and servicing proposals against Building Regulations and the LBB Waste and Recycling Storage and Collection Guidance for Residential Properties ('the LBB Waste Guidance').
- 6.90 The SRMP demonstrates that delivery vehicles, refuse vehicles and fire appliances can enter the Site via the southern access and exit via the northern access. In accordance with the LBB Waste Guidance, the distance between the bin storage and point of collection for the refuse vehicle is no more than 10m.
- 6.91 In accordance with Building Regulations, the fire appliance can stop within 18m of the dry inlet point by choosing to either enter the Site or stop on the service road outside the Site.
- 6.92 The proposed development fully accords with BDMP Policy DMP1 and DMP13 and LP Policy T7 by providing adequate off-street space for servicing and deliveries.

Cycle parking

- 6.93 LP Policy T5 requires new proposals to secure the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. LP Table 10.2 sets out the minimum cycle-parking standards developments are required to meet. For residential developments, the following standards apply for:
- 1 long-stay space per studio or 1 bed 1 person dwelling;

- 1.5 long-stay spaces per 1 bed 2 person dwelling;
 - 2 long-stay spaces per all other dwellings; and
 - 2 short-stay spaces per 5-40 dwellings and thereafter 1 space per 40 dwellings.
- 6.94 LP Policy T5 also states that cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards and that development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people. Chapter 8 of the London Cycle Design Standards (revised 2016) recommends that at least 5% of all cycle spaces should be capable of accommodating a larger cycle.
- 6.95 The proposed development generates a requirement for 79.5 long-stay cycle parking spaces and three short-stay spaces. 80 long-stay cycle parking spaces are proposed within the ground floor of the building. Six (7.5%) of the long-stay cycle parking spaces are capable of accommodating larger cycles, exceeding the London Cycling Design Standards. Four short-stay cycle parking spaces are provided externally to the front of the building.
- 6.96 Therefore the proposals fully accord with the LP cycle parking standards and help support sustainable travel to and from the Site.

Car parking

- 6.97 LP Policy T6 states that car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite').
- 6.98 LP Policy T6.1 states that new residential development should not exceed the maximum parking standards set out in Table 10.3. The site has a PTAL rating of 1b. The maximum parking provision for an Outer London site with a PTAL of 0-1 is up to 1.5 space per dwelling.
- 6.99 BDMP Policy DMP12 states that new developments should provide parking consistent with Appendix 1. The maximum parking standards for sites with a PTAL of 1-3 are 1 space per 1-2 bed dwelling and 1.5 spaces per 3 bed dwelling.
- 6.100 BDMP Policy DMP12 further states that additional parking provision should not have negative impacts on existing parking, highways, other forms of movement or the environment. The removal of surplus parking spaces will be encouraged. Development will be supported where it does not: add to on-street parking demand where on-street parking spaces cannot meet existing demand such as on heavily parked streets, or otherwise harm existing on-street parking conditions.
- 6.101 LP Policy T6.1 also requires at least 20% of parking spaces to have active charging facilities for electric or Ultra-Low Emission vehicles, with passive provision for all remaining spaces.
- 6.102 The maximum car parking for the proposed development, based on LBB's standards is 48 spaces. The TS states that the likely level of car ownership associated with the

proposed development, based on a review of the National Census 2011, is approximately 32 vehicles.

- 6.103 18 parking spaces are provided via an undercroft, including two disabled parking bays. The TS states that in unconstrained circumstances, the forecast parking accumulation for the proposed development will likely exceed the provision and result in a total of 16-20 vehicles being displaced.
- 6.104 Parking surveys were conducted overnight on Wednesday 5th and Thursday 6th May 2021. The surveys identified the equivalent of 267 legitimate overnight parking spaces within circa 200m walking distance of the Site. The parking surveys indicate available overnight on-street capacity of circa 23 spaces in the immediate vicinity of the Site and an overnight capacity of circa 150 spaces within the wider study area. The parking surveys indicate that there is sufficient existing capacity in the surrounding network to accommodate the identified displaced vehicles on-street.
- 6.105 Electric car charging provision will be provided to meet the London Plan standards of 20% active from the outset and 80% passive.
- 6.106 In conclusion, the proposed development accords with the maximum parking standards and requirements for electric vehicle charging set out in LP Policy T6.1 and BDMP Policy DMP12. The parking surveys conducted demonstrate that there is capacity on the surrounding highway network to accommodate the identified displaced vehicles on-street, in accordance with BDMP Policy DMP 12.

Trip Generation

- 6.107 The TS demonstrates that the proposed development is comparable in highway terms to the current level of activity associated with the restaurant use on Site, and that the forecast trip generation is equivalent to that already present and accepted on the highway network.
- 6.108 The proposed development therefore represents no material detriment to the highway network and will likely represent an improvement from the existing position in terms of vehicular trip generation.

Energy and sustainability

- 6.109 LP Policy SI2 states that major development to be net zero-carbon, in accordance with the following energy hierarchy:
- 1) be lean: use less energy and manage demand during operation
 - 2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
 - 3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
 - 4) be seen: monitor, verify and report on energy performance.
- 6.110 Policy SI2 further states a minimum on-site reduction of at least 35% beyond Building Regulations is required for major development. Residential development should

achieve 10%, and non-residential development 15% through energy efficiency measures. Where it is demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided through a cash in lieu contribution to the borough's carbon offset fund.

- 6.111 BCS Policy CP 19 requires major proposals and proposals for sensitive uses (education, health and housing) in Air Quality Management Areas, to submit a Sustainability Statement demonstrating, at the design stage, how sustainable design and construction measures are used to mitigate and adapt to climate change over the intended lifetime of a development. This includes the application of the London Plan energy hierarchy and meeting or exceeding the London Plan targets.
- 6.112 An Energy Strategy Report and Sustainability Statement is submitted with this application are and the key findings are:
- An overall improvement in regulated emissions at over 72.97% above Part L 2013 standard, through the adoption of high standards of insulation, heat pump driven heating and hot water systems to the flats and a roof mounted PV array.
 - A carbon offset payment of £35,568, together with the adoption of the above strategy, will meet the LP "Zero Carbon" requirements.
 - The Site is within a Heat Network Priority Area. Therefore consideration has been given to the longer term opportunity to connect the proposed development to a District Energy Network (DEN). The design safeguards an identified route from the proposed plant room to the property boundary at ground floor level, roadway or similar for flow and return pipes to enable connection to a future area wide DEN.
 - As there is no district heating network immediately planned or feasible, apartment air source heat pumps are proposed for space heating and hot water production. As detailed in the Be Green stage the system will incorporate air source heat pumps technology to maximise efficiency.
 - If district heating is connected to the building in the future, the individual ASHP and domestic hot water cylinder could be replaced with a new HIU in each apartment, providing heat to the existing underfloor heating manifold network, as well as instantaneous hot water.
- 6.113 Overall, the proposed development aims to provide extensive energy efficiency measures and renewable energy sources that ensure a low carbon and sustainable development in accordance with LP Policy SI2 and BCS Policy CP 19.

Landscaping, trees and urban greening

Landscaping

- 6.114 BDMP Policy DMP1 states that development proposals will be acceptable provided that (amongst other matters) they retain high amenity trees and landscape features or provide appropriate additions or enhancements.

- 6.115 The existing Site has limited landscape features, the Site is predominantly covered by the restaurant building and associated car park, with a number of mature trees and shrubs to the boundaries. The Landscape Design Statement, Initial Landscape Specification and UGF Report submitted with this application states that the existing Site vegetation gives the feel and impression of lacking in previous maintenance and management of longer term objectives.
- 6.116 The proposals benefit from a high-quality landscaping scheme which illustrates a strong commitment to enhancing landscape and environment. Increased tree and hedge screening is provided to the Site frontage and existing boundary vegetation and trees are preserved where possible in line with BDMP Policy DMP1 (see Trees section below for further information).
- 6.117 The layout, theme and rhythm of the design generally provides for soft landscape areas which frame key entrances and exits and enhance the adjacent street scene and public realm.
- 6.118 The Landscape Design Statement, Initial Landscape Specification and UGF Report, produced provides further information on landscaping.

Trees

- 6.119 LP Policy G7, BDMP Policy DMP1 and DBLP Policy BG12 require development proposals to ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system.
- 6.120 DBLP Policy BG12 requires development proposals with either existing trees on site or adjoining the Site to submit a tree survey.
- 6.121 There are individual trees to the front of the Site and a group of trees along the north and southern boundary. There are also a number of trees outside of but close to the Site boundary. A Tree Report and Tree Protection Plan has therefore been submitted with this application.
- 6.122 The proposed development will require the removal of category C1 and C2 trees only. These trees are therefore low quality and the Tree Report and Tree Protection Plan confirmed that they can be replicated with new planting to provide screening and better enhance the Site for wildlife habitat.
- 6.123 The proposed development does not encroach into the Root Protection Areas (RPA) of the trees being retained and therefore deep excavation works will not impact on these protected areas.
- 6.124 A lot of the area within the RPAs is currently occupied by hard surfacing. The proposed development means that in some places the hard surfacing will be removed and transformed into garden space, which will be beneficial for the trees.

6.125 Overall, the proposed development is considered to be in accordance with LP Policy G7, BDMP Policy DMP1 and DBLP Policy BG12.

Urban greening

6.126 LP Policy G5 requires major development proposals to contribute to the greening of London by including urban greening as the fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. Boroughs are expected to develop an Urban Greening Factor (UGF) to determine the appropriate amount of urban greening required in new developments. The Mayor recommends a target score of 0.4 for developments that are predominantly residential.

6.127 Through landscaping improvements, the proposed development would result in a UGF of 0.45, which is in accordance with LP policy G5.

6.128 The Landscape Design Statement, Initial Landscape Specification and UGF Report provides further information on UGF.

Fire Strategy

6.129 A Fire Statement has been submitted with this application which demonstrates compliance with the requirements of LP Policy D5 and D12

7 Conclusion

- 7.1 This Planning Statement has been prepared by Stantec on behalf of Fruition Properties Limited in support of development at 231 Watford Road, Harrow, HA1 3TU.
- 7.2 The proposals follow extensive pre-application engagement throughout 2020 and 2021, as detailed in section 3 of the Planning Statement and the DAS.
- 7.3 The proposals will provide an additional 43 dwellings in Brent, assisting LBB in meeting their housing targets.
- 7.4 The principle of residential redevelopment of the Site and the loss of the restaurant use is considered to be acceptable and was accepted by LBB Officers during pre-application discussions.
- 7.5 Family sized units (3 bedrooms or more) will comprise 21% of the proposed units mix. This is considered an appropriate response to the constraints of the Site and policy requirements, and the benefits of the scheme in delivering additional homes, and providing flats in an area dominated by houses, are considered to outweigh the harm identified with falling slightly below the target for family sized units.
- 7.6 All units meet minimum internal space standards and private amenity space standards set out in the LP Policy D6. The shortfall in private amenity space for the upper floors, when assessed against BDMP Policy DMP19, is offset by the communal garden at ground floor and the fourth floor roof terrace.
- 7.7 A Fire Statement has been submitted with this application which demonstrates compliance with the requirements of LP Policy D5 and D12.
- 7.8 The proposed development accords with LP Policy D7 by providing four wheelchair adaptable dwellings, which equates to 10% of the total proposed units. The remaining 39 units meet Building Regulation M4(2) 'accessible and adaptable dwellings'.
- 7.9 18 parking spaces are proposed on-site, including two disabled parking spaces. A Lambeth-style parking survey has been undertaken which demonstrates that there is adequate space on the surrounding roads to accommodate the potential cars displaced as part of the proposed development.
- 7.10 80 long-stay and four short-stay cycle parking spaces are provided, which is in line with LP Policy T5. Six of the long-stay spaces are capable of accommodating larger cycles which exceeds the London Cycling Design Standards.
- 7.11 Overall, the proposals are considered to accord with the LP, the LBB Development Plan and other material considerations including NPPF policies for delivering a wide choice of high-quality homes and achieving sustainable development. Planning permission should therefore be granted.
- 7.12 Stantec look forward to working with LBB during the application process.